

The Honorable Robert S. Lasnik

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
SEATTLE

RANDI GOMEZ CERVANTES,

Plaintiff,

v.

CYNTHIA MUNITA, Field Office Director for
United States Citizenship and Immigration
Services, Seattle Office, *et al.*,

Defendants.

CASE NO. 2:19-cv-00367-RSL

JOINT MOTION TO STAY
PROCEEDINGS

Plaintiff, Randi Gomez Cervantes, and Defendants, Cynthia Munita, *et al.* (collectively, “the parties”), by and through their respective counsel, jointly move to further stay all proceedings in this matter for an additional 30 days, until January 17, 2020, to allow sufficient time for U.S. Citizenship and Immigration Services (“USCIS”) to issue a decision on Plaintiff’s application to adjust to permanent resident status (“Form I-485”), the denial of which is the subject of this litigation.

On July 19, 2019, the parties jointly moved to stay proceedings for 90 days, until October 17, 2019, and the Court granted that motion on July 24, 2019. ECF No. 11. As indicated in that motion to stay proceedings, USCIS reopened Plaintiff’s Form I-485 and re-interviewed Plaintiff on July 16, 2019. ECF No. 10. On October 17, 2019, the parties jointly filed a second motion to stay proceedings, this time for 30 days. ECF No. 12. In that motion, the parties indicated that USCIS had

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1 interviewed an additional individual with knowledge relevant to the application, and that Plaintiff's
 2 application remained pending. *Id.* On October 25, 2019, the Court granted the parties' second joint
 3 motion to stay proceedings, thereby staying the case for an additional 30 days. ECF No. 13. The
 4 Court further provided that, if necessary, the parties should file a joint status report by November 18,
 5 2019. *Id.* Consistent with the Court's October 25, 2019 Order, the parties informed that Court that a
 6 decision on Plaintiff's Form I-485 was pending. On November 19, 2019, the Court granted the
 7 parties' third joint motion to stay proceedings until December 18, 2019. ECF 15.

8 Pursuant to the Court's November 19, 2019 order, the parties submit this status report to
 9 inform the court that USCIS's counsel has been informed that Plaintiff's application has been
 10 approved and the Form I-551 will be issued to Plaintiff in the near future. No documentation of this
 11 determination is available at this time for Plaintiff's counsel to confirm this information. Insofar as
 12 USCIS's forthcoming decision most likely will obviate the need for further proceedings in this
 13 matter, the parties jointly move that proceedings be stayed an additional 30 days, until January 17,
 14 2020. This motion is thus supported by good cause and will not result in undue delay in the
 15 administration of this case. If the Court grants this Order, the parties will jointly update the Court on
 16 or before January 17, 2020, as to the necessity of further proceedings.

17 WHEREFORE, the parties jointly move that this Court stay proceedings for an additional 30
 18 days, until January 17, 2020, pending USCIS's final determination on Plaintiff's Form I-485.

19 DATED this 18th day of December, 2019.

20 Respectfully submitted,

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Attorney for Plaintiff

PROPOSED ORDER

IT IS SO ORDERED. In accordance with the joint motion of the parties, the case is stayed for an additional 30 days, until January 17, 2020. On or before January 17, 2020, the parties shall provide the Court with a joint status report as to the need for further proceedings.

DATED THIS 19th day of December, 2019.



HON. ROBERT S. LASNIK
UNITED STATES DISTRICT COURT JUDGE